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ANDREA NAKAGAWA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANDREA NAKAGAWA,)	CASE NO. C06-02066 SI
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED]
vs.)	ORDER FOR ENLARGEMENT OF
)	TIME FOR DISCOVERY AND
THE REGENTS OF THE UNIVERSITY OF)	MODIFICATION OF PRETRIAL
CALIFORNIA, et al.,)	PREPARATION ORDER
)	
Defendants.)	
)	

The parties to the above-captioned action, pursuant to Local Rule 6-2(a), hereby request the Court to continue the dates set forth in the Court's Pre-trial Preparation Order filed on March 14, 2007, pursuant to the parties' stipulation, as set forth below.

Event	Current Date	Continued Date
Jury Trial Date	April 7, 2008	October 8, 2008
Non - Expert Cutoff	December 14, 2007	June 13, 2008
Designation of Experts	October 19, 2007	April 18, 2008
Designation of Rebuttal Experts	November 2, 2007	May 2, 2008
Expert Discovery Cutoff	December 14, 2007	June 13, 2008
Dispositive Motions Filed	January 11, 2008	July 11, 2008

1	Opposition to Motions Due	January 25, 2008	July 25, 2008
2	Reply to Motions Due	February 1, 2008	August 1, 2008
3	Dispositive Motion Hearing Date	February 15, 2008	August 15, 2008
4	Pre-trial Conference Date	March 25, 2008	September 25, 2008

5 In support of the foregoing Stipulation, the parties through their undersigned counsel,
6 declare as follows:

7 1. Defendant originally removed this action to Federal Court on March 20, 2006.
8 Over the course of the next year, the action was repeatedly stayed by mutual agreement of the
9 parties while plaintiff pursued her internal remedies. On March 9, 2007, an Initial Case
10 Management Conference was held before the Court and a Pretrial Preparation Order was
11 adopted, setting the trial schedule summarized above. On April 19, 2007, Defendants filed their
12 Answer to the First Amended Complaint. This is the first request that the parties have made to
13 alter or extend the Scheduling Order in this matter.

14 2. The parties have exchanged written discovery. Not all documents requested by
15 Plaintiff have been produced and Defendant is still attempting to obtain the remaining documents
16 requested by Plaintiff. Plaintiff intends to begin noticing depositions within the next month and
17 anticipates the necessity for further depositions when all written discovery has been completed.
18 Counsel are currently engaged in meeting and conferring in an effort to resolve discovery issues.
19 Counsel agree that the necessary discovery cannot be completed within the current time
20 schedule.

21 3. Counsel therefore agree that it remains desirable and necessary to extend the time
22 by six months for the completion of discovery, including depositions. In order to complete all
23 remaining pre-trial matters within a reasonable and equitable time schedule, counsel propose to
24 extend all dates in the Scheduling Order, including the discovery cut off dates, the date for
25 hearing dispositive motions, and the trial date in accordance with the schedule proposed above.

26 For the foregoing reasons, the parties hereto, by and through their undersigned counsel,
27 declare, under penalty of perjury, that the foregoing statements are true and correct, and request
28 the Court to continue the trial date and other schedules as set forth above.

IT IS SO STIPULATED.

Gordon & Rees LLP
Embarcadero Center West
275 Battery Street, Suite 2000
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Dated: October 9, 2007

LAW OFFICES OF NEVIN & ABSALOM

By: /s/ Edward J. Nevin
Edward J. Nevin
Attorneys for Plaintiff
ANDREA NAKAGAWA

Dated: October 9, 2007

GORDON & REES, LLP

By: /s/ Michael A. Laurenson
Michael A. Laurenson
Attorneys for Defendant
THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA

[PROPOSED] ORDER

Based on the stipulation of the parties and good cause appearing therefore, it is hereby

Ordered that the Pretrial Preparation Order is modified as follows:

Event	New Date	
Jury Trial Date	October 8, 2008	October 14, 2008
Non - Expert Cutoff	June 13, 2008	
Designation of Experts	April 18, 2008	
Designation of Rebuttal Experts	May 2, 2008	
Expert Discovery Cutoff	June 13, 2008	
Dispositive Motions Filed	July 11, 2008	
Opposition to Motions Due	July 25, 2008	
Reply to Motions Due	August 1, 2008	
Dispositive Motion Hearing Date	August 15, 2008	August 23, 2008
Pre-trial Conference Date	September 25, 2008	September 23, 2008

IT IS SO ORDERED.

Date:



JUDGE OF THE UNITED STATES DISTRICT COURT